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## ADMINISTRATIVE RECORD INDEX

for the

BAY DRUMS SOURCE CONTROL (OPERABLE UNIT 3)  
PEAK OIL/BAY DRUMS NPL Site

Roll #1 —

## 1.0 PRE-REMEDIAL

## 1.4 Work Plans and Progress Reports

- VOL.1 FRAME#: 0001-1. "Study Plan; Peak Oil/Bay Drum; Seffner, Florida; August 11, 1983; TDD#F4-8307-09," NUS Corporation (August 11, 1983). Concerning plan of investigation to locate possible drum/burial area to be carried out August 22-26, 1983.
- 0008-2. "Study Plan; Hazardous Waste Site Investigation; Peak Oil/Bay Drum Site; Tampa, Florida; ESD Project #83-225," EPA Region IV Environmental Services Division, Athens, Georgia (August 22, 1983). Concerning plan of sampling investigation to be carried out August 22-26, 1983.
- 0017-3. "Study Plan; Bay Drum Site; Brandon, Florida; ESD Project #86-185," EPA Region IV Environmental Services Division, Athens, Georgia (January 1986). Concerning a field investigation to be performed at the Bay Drums Site on February 26-27, 1986.

## 1.8 Preliminary Assessment Documents

- 0024-1. "Potential Hazardous Waste Site - Preliminary Assessment," Bob Hay, NUS Corporation (August 14, 1987).

## 1.9 Site Inspection Documents

- 0031-1. "Site Inspection Report; Peak Oil/Bay Drum; Tampa, Florida; TDD F4-8307-07," NUS Corporation (July 25, 1983). Concerning report of site inspections carried out at Peak Oil and Bay Drums on July 14, 1983.
- 0047-2. Letter from Alan Leggett, NUS Corporation, to R.D. Stonebraker, EPA Region IV (September 27, 1983). Concerning report of joint investigation carried out September 12-16, 1983.

## 1.9 Site Inspection Documents (cont'd.)

- 0055- 3. Memorandum from R.J. Bruner, EPA Region IV, to Al Smith, EPA Region IV (March 13, 1984). Concerning transmittal of attached "Report; Hazardous Waste Site Investigation; Peak Oil/Bay Drum Site; Tampa, Florida; February 22, 1984," EPA Region IV Environmental Services Division, Athens, Georgia.
- 0105- 4. "Potential Hazardous Waste Site - Site Inspection Report," Ron Joyner, EPA Region IV (April 24, 1984).

## 2.0 REMOVAL RESPONSE

## 2.2 Sampling and Analysis Data

- 0118- 1. Memorandum from EPA Region IV Environmental Services Division, Athens, Georgia, to Doug Lair, EPA Region IV (September 28, 1988). Concerning transmittal of attached report "Air Study Results; July 1988," to determine possible levels of VOCs, pesticides, PCBs, and asbestos prior to removal of asbestos shingles, carried out June 14-16, 1988.
- 0138- 2. "Air Sampling Investigation: Bay Drum Site; Tampa, Florida," Roy F. Weston, Inc. (May 1989). Concerning report of sampling carried out March 10-17, 1989, to determine possible levels of asbestos, pesticides, and hydrocarbons during on-site activities.
- 0299- 3. Memorandum from Howard Syvarth, Roy F. Weston, Inc., to Sella Burchette, Roy F. Weston, Inc. (June 23, 1989). Concerning trip report for air monitoring carried out June 6-9, 1989, to follow up on sampling carried out March 10-20, 1989.
- 0303- 4. Memorandum from Danny France, EPA Region IV, to Tom Bennett, EPA Region IV (July 18, 1989). Concerning transmittal of attached "Air Study Plan," for performing post-shingle removal air monitoring to begin August 1, 1989.
- 0309- 5. "Bay Drum Air Toxics Study; Post Shingle Removal," EPA Region IV Environmental Services Division, Athens, Georgia (October 1989). Concerning results of air study carried out July 31-August 2, 1989, to determine possible levels of VOCs, pesticides, metals, and PCBs in the air after removal of shingles during May and June 1989.

## 2.4 Work Plans and Progress Reports

1. Cross-Reference: "Final Work Plan for Surface Remedial Investigation and Feasibility Study; Bay Drums Superfund Site; Brandon, Hillsborough County; Florida," EPA Region IV (August 1989). Concerning Remedial Investigation/Feasibility Study (RI/FS) Work Plan, with appended Removal Work Plan, volume survey of shingle pile, and preliminary risk analysis. [Filed and cited as entry number 1 in 3.4 REMEDIAL INVESTIGATION (RI) - Work Plans and Progress Reports]

## 2.7 Applicable or Relevant and Appropriate Requirements (ARARs)

- 0391- 1. Memorandum from Meredith Anderson, EPA Region IV, to Greg Powell, EPA Region IV (August 9, 1988). Concerning Clean Air Act requirements for removal of asbestos shingles.

## 2.8 Removal Response Reports

1. Cross-Reference: "Final Work Plan for Surface Remedial Investigation and Feasibility Study; Bay Drums Superfund Site; Brandon, Hillsborough County; Florida," EPA Region IV (August 1989). Concerning Remedial Investigation/Feasibility Study (RI/FS) Work Plan, with appended Removal Work Plan, volume survey of shingle pile, and preliminary risk analysis. [Filed and cited as entry number 1 in 3.4 REMEDIAL INVESTIGATION (RI) - Work Plans and Progress Reports]
- 0404- 2. Memorandum from Keith Laguaite, Roy F. Weston, Inc., to Fred Stroud, EPA Region IV (May 26, 1992). Concerning report estimating volume of material remaining at the Bay Drums site following removal of shingles.

## 3.0 REMEDIAL INVESTIGATION (RI)

### 3.2 Sampling and Analysis Data

1. Verified Sampling Data, Chain of Custody Forms and Quality Assurance and Quality Control Documents related to Verified Sampling Data are currently located at EPA Region IV Environmental Services Division, Athens, Georgia. Such documentation will be made available for review upon request sent to the Remedial Project Manager for the Bay Drums Source Control, Peak Oil/Bay Drums, Operable Unit 3, Superfund Site, Region IV, U.S. EPA, 345 Courtland Street, Atlanta, Georgia 30365.

### 3.4 Work Plans and Progress Reports

- 0450 - 1. "Final Work Plan for Surface Remedial Investigation and Feasibility Study; Bay Drums Superfund Site; Brandon, Hillsborough County; Florida," EPA Region IV (August 1989). Concerning Remedial Investigation/Feasibility Study (RI/FS) Work Plan, with appended Removal Work Plan, volume survey of shingle pile, and preliminary risk analysis.

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### 3.7 Applicable or Relevant and Appropriate Requirements (ARARs)

- 0601 - 1. Letter from David James, State of Florida Department of Environmental Regulation, to Gayle Carlson, Trenam, Simmons, Kemker, Scharf, Barkin, Frye & O'Neill, and Laurel Lockett, Carlton, Fields, Ward, Emmanuel, Smith & Cutler (January 27, 1992). Concerning transmittal of attached Applicable or Relevant and Appropriate Requirements (ARARs) for Peak Oil, Bay Drums, and Reeves Southeastern Galvanizing Superfund sites.

### 3.8 Interim Deliverables

- 0605 - 1. "Quality Assurance Program Plan," OHM Corporation (May 25, 1989).
- 0685 - 2. "Bay Drums Site; Remedial Investigation Project Operations Plan," EPA Region IV Environmental Services Division, Athens, Georgia, and EPA Region IV (June 19, 1989). Concerning Project Operations Plan (POP), including appended Wetland Impact Study Plan.

### 3.9 Action and Decision Memoranda

- 0808 - 1. Memorandum from Patrick Tobin, EPA Region IV to Jack Ravan, EPA Region IV (April 1, 1987). Concerning a request for authorization to proceed with a Remedial Investigation and Feasibility Study.

### 3.10 Remedial Investigation (RI) Reports

- 0812 - 1. Memorandum from John McConney, EPA Region IV Environmental Services Division, Athens, Georgia, to Madolyn Streng, EPA Region IV (May 6, 1992). Concerning comments to the draft Remedial Investigation and Baseline Risk Assessment.
- 0814 - 2. Letter from John Mitchell, Florida Department of Natural Resources, to Madolyn Streng, EPA Region IV (May 7, 1992). Concerning comments to the draft Remedial Investigation and Risk Assessment.

## 3.10 Remedial Investigation (RI) Reports (cont'd.)

- 0817-3. Letter from J. Kyle Harris, Bay Drums PRP Group, to Madolyn Streng, EPA Region IV (May 12, 1992). Concerning comments on the final Remedial Investigation and Baseline Risk Assessment.
- 0824-4. Letter from Gayle Carlson, Trenam, Simmons, Kemker, Scharf, Barkin, Frye & O'Neill for Reeves Southeastern Corporation, to Madolyn Streng, EPA Region IV (May 22, 1992). Concerning comments to the Remedial Investigation and Baseline Risk Assessment.
- 0836-5. Memorandum from Fred Sloan, EPA Region IV Environmental Services Division, Athens, Georgia, to Madolyn Streng, EPA Region IV (May 28, 1992). Concerning comments to the Remedial Investigation and Baseline Risk Assessment.
- 0838-6. Letter from Glen Gorski, Canonie Environmental Services Corp. on behalf of the Peak Oil Site Generators Group, to Madolyn Streng, EPA Region IV (June 8, 1992). Concerning comments to the Remedial Investigation and Baseline Risk Assessment.
- 0853-7. Letter from J. Kyle Harris, Bay Drums PRP Group, to Madolyn Streng, EPA Region IV (June 9, 1992). Concerning additional comments to the Risk Assessment.
- 0861-8. Memorandum from Winston Smith, EPA Region IV, to Joseph Franzmathes, EPA Region IV (June 18, 1992). Concerning comments to the Remedial Investigation and Baseline Risk Assessment.
- 0863-9. Memorandum from Rebecca Fox, EPA Region IV, to Madolyn Streng, EPA Region IV (June 18, 1992). Concerning review of PRP comments to the Baseline Risk Assessment.
- 0871-10. Memorandum from Kay Wischkaemper, EPA Region IV, to Madolyn Streng, EPA Region IV (June 19, 1992). Concerning comments to the Remedial Investigation.
- VOL.3 0878-11. "Final Remedial Investigation and Baseline Risk Assessment; Bay Drums Superfund Site; Brandon, Hillsborough County, Florida; July 1992," EPA Region IV (July 1992).

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## 3.11 Health Assessments

- 1253-1. "Preliminary Health Assessment for Bay Drums; Tampa, Hillsborough County, Florida; FLD088783865," Agency for Toxic Substances and Disease Registry (July 17, 1989).

### 3.12 Endangerment Assessments

1. Cross-Reference: "Final Work Plan for Surface Remedial Investigation and Feasibility Study; Bay Drums Superfund Site; Brandon, Hillsborough County; Florida," EPA Region IV (August 1989). Concerning Remedial Investigation/Feasibility Study (RI/FS) Work Plan, with appended Removal Work Plan, volume survey of shingle pile, and preliminary risk analysis. [Filed and cited as entry number 1 in 3.4 REMEDIAL INVESTIGATION (RI) - Work Plans and Progress Reports]
- 1262- 2. Memorandum from Madolyn Streng, EPA Region IV, to Bernie Hayes, EPA Region IV (April 27, 1992). Concerning a request for calculation of soil remediation goals.
- 1264- 3. Letter from Kay Wischkaemper, EPA Region IV, to Madolyn Streng, EPA Region IV (June 17, 1992). Concerning attached soil clean-up levels.
4. Cross-Reference: "Final Remedial Investigation and Baseline Risk Assessment; Bay Drums Superfund Site; Brandon, Hillsborough County, Florida; July 1992," EPA Region IV (July 1992). [Filed and cited as entry number 11 in 3.10 REMEDIAL INVESTIGATION (RI) - Remedial Investigation (RI) Reports]

## 4.0 FEASIBILITY STUDY (FS)

### 4.8 Interim Deliverables

- 1279- 1. Memorandum from Ben Blaney, EPA Region V Risk Reduction Engineering Laboratory, Cincinnati, Ohio, to David Abbott, EPA Region IV (June 11, 1992). Concerning transmittal of summary of treatability screening tests, including attached evaluation of thermal desorption and solidification/stabilization treatment technologies.

### 4.9 Feasibility Study (FS) Reports

- 1408- 1. "Final Feasibility Study Report; Bay Drums Source Control; Peak Oil/Bay Drums NPL Site; Brandon, Florida," EPA Region IV (September 1992).

### 4.10 Proposed Plans for Selected Remedial Action

- 1581- 1. "United States Environmental Protection Agency; Superfund Proposed Plan Fact Sheet; Bay Drums Site; Tampa, Hillsborough County, Florida," EPA Region IV (August 1992).

4.10 Proposed Plans for Selected Remedial Action  
(cont'd.)

- 1597 - 2. Memorandum from Rebecca Fox, EPA Region IV, to Madolyn Dominy, EPA Region IV (August 5, 1992). Concerning comments to the Proposed Plan Fact Sheet.
- 1600 - 3. Memorandum from Candace Wingfield, US Environmental Protection Agency Headquarters, Washington, DC, to Madolyn Streng, EPA Region IV (August 11, 1992). Concerning comments to the Proposed Plan Fact Sheet.
- 1602 - 4. Letter from Fred McKay and Anton Plaines, Terra Vac, to Madolyn Dominy, EPA Region IV (August 26, 1992). Concerning questions based on information provided in Proposed Plan Fact Sheet.
- 1605 - 5. Letter from John Mitchell, Florida Department of Natural Resources, to Madolyn Dominy, EPA Region IV (September 4, 1992). Concerning need for copy of Feasibility Study Report in order to evaluate the Proposed Plan Fact Sheet.
- 1607 - 6. Letter from Gayle Carlson, Trenam, Simmons, Kemker, Scharf, Barkin, Frye & O'Neill, to Madolyn Dominy, EPA Region IV (September 12, 1992). Concerning comments to the Proposed Plan Fact Sheet on behalf of Reeves Southeastern Corporation.
- 1609 - 7. Letter from Robert Rhodes, Jr., Peak Oil Site Generators Group, to Madolyn Dominy, EPA Region IV (September 14, 1992). Concerning comments to the Proposed Plan Fact Sheet.
- 1612 - 8. Letter from Scott Steady, Williams Reed Weinstein Schifino & Mangione, to Madolyn Dominy, EPA Region IV (September 17, 1992). Concerning comments to the Proposed Plan Fact Sheet.
- 1614 - 9. Memorandum from Waynon Johnson, National Oceanic and Atmospheric Administration (NOAA), to Madolyn Dominy, EPA Region IV (September 18, 1992). Concerning comments to Proposed Plan Fact Sheet and draft Record of Decision (ROD).
- 1618 - 10. Letter from Robert Rhodes, Jr., Peak Oil Site Generators Group, to Madolyn Dominy, EPA Region IV (September 18, 1992). Concerning comments to the Proposed Plan Fact Sheet for Peak Oil Source Control NPL Site, including discussion of the clean up goal for lead.

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## 5.0 RECORD OF DECISION (ROD)

## 5.9 Record of Decision (ROD)

- 1639 - 1. Letter from John Mitchell, Florida Department of Natural Resources, to Madolyn Dominy, EPA Region IV (September 16, 1992). Concerning comments to the draft Record of Decision (ROD).
- 1642 - 2. Memorandum from Kay Wischkaemper, EPA Region IV, to Madolyn Dominy, EPA Region IV (September 16, 1992). Concerning comments to the draft Record of Decision (ROD).
- 1644 - 3. Memorandum from Rebecca Fox, EPA Region IV, to Madolyn Dominy, EPA Region IV (September 17, 1992). Concerning comments to the draft Record of Decision (ROD).
4. Cross-Reference: Memorandum from Waynon Johnson, National Oceanic and Atmospheric Administration (NOAA), to Madolyn Dominy, EPA Region IV (September 18, 1992). Concerning comments to Proposed Plan Fact Sheet and draft Record of Decision (ROD). [Filed and cited as entry number 9 in 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action]
- 1648 - 5. Memorandum from Candace Wingfield, US Environmental Protection Agency Headquarters, to Mark Fite, EPA Region IV (September 28, 1992). Concerning comments to the draft Record of Decision (ROD).
- 1653 - 6. Memorandum from Mark Fite, EPA Region IV, to Site Administrative Record File (March 30, 1993). Concerning discussion of concerns of the National Oceanic and Atmospheric Administration (NOAA) on the Record of Decision (ROD).
- 1655 - 7. Memorandum from Mark Fite, EPA Region IV, to Site Administrative Record File (March 30, 1993). Concerning discussion of concerns of Florida Department of Natural Resources on the Record of Decision (ROD).
- 1657 - 8. Letter from John Mitchell, Florida Department of Natural Resources, to David Abbott, EPA Region IV (March 31, 1993). Concerning need for a 1-foot thick cap to be placed over the non-solidified soils as part of the Record of Decision (ROD).



## 5.0 RECORD OF DECISION (ROD)

## 5.9 Record of Decision (ROD) (cont'd.)

- 1659- 9. Memorandum from Mark Fite, EPA Region IV, to Site Administrative Record (March 31, 1993). Concerning supplemental cost estimate for a 1-foot thick cap.
- 1661- 10. "Record of Decision: Operable Unit 3: Peak Oil/Bay Drums Site; Brandon, Hillsborough County, Florida," EPA Region IV (March 31, 1993).

## 10.0 ENFORCEMENT

## 10.6 State and Local Enforcement Records

- 1738- 1. Notice of Violation and Orders for Corrective Action, Before The State of Florida Department of Environmental Regulation; State of Florida Department of Environmental Regulation, Complainant, vs. Resource Recovery Association, Inc., a wholly owned subsidiary of Renaissance Group of Tampa, Inc., Respondent; In the Office of the Southwest District; OGC File 86-0848 (July 28, 1986).

## 10.11 EPA Administrative Orders

- 1751- 1. Order Pursuant to Section 106(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), 42 U.S.C. s9606, as Amended by the Superfund Amendments and Reauthorization Act of 1986; (November 12, 1986). IN THE MATTER OF Bay Drums, Inc.; Bennie Genuardi; Resource Recovery Association Inc.; Renaissance Group, Inc.; Dale Allen, Jay B. Moore, Allen Z. Wolfson, Respondents; Docket No.: 86-02-C.
2. Cross-Reference: Administrative Order by Consent, IN THE MATTER OF Peak Oil Site, Bay Drums Site, Reeves Southeastern Corporation Site, Tampa, Florida, See attachment 1 to this Order for a Complete List of Respondents Consenting to this Order (January 1989). [Filed and cited in the Administrative Record for the Area-Wide Groundwater Remedial Investigation/ Feasibility Study].

## 11.0 POTENTIALLY RESPONSIBLE PARTIES (PRP)

### 11.7 PRP Steering Committee Documents

- 1770 - 1. Letter from Patrick Tobin, EPA Region IV, to Mark Bentley, Taub & Williams, for Ashland Chemical Company and the Bay Drums PRP Steering Committee (April 4, 1988). Concerning response to letter of March 8, 1988, offering to prepare the work plan for and conduct the surface Remedial Investigation/Feasibility Study, and participate in the areawide groundwater Remedial Investigation/Feasibility Study.
2. Cross-Reference: Letter from J. Kyle Harris, Bay Drums PRP Group, to Madolyn Streng, EPA Region IV (May 12, 1992). Concerning comments on the final Remedial Investigation and Baseline Risk Assessment. [Filed and cited as entry number 3 in 3.10 REMEDIAL INVESTIGATION (RI) - Remedial Investigation (RI) Reports]

### 11.9 PRP-Specific Correspondence

1. Cross-Reference: Letter from Patrick Tobin, EPA Region IV, to Mark Bentley, Taub & Williams, for Ashland Chemical Company and the Bay Drums PRP Steering Committee (April 4, 1988). Concerning response to letter of March 8, 1988, offering to prepare the work plan for and conduct the surface Remedial Investigation/Feasibility Study, and participate in the areawide groundwater Remedial Investigation/Feasibility Study. [Filed and cited as entry number 1 in 11.7 POTENTIALLY RESPONSIBLE PARTIES (PRP) - PRP Steering Committee Documents]

## 13.0 COMMUNITY RELATIONS

### 13.6 Community Relations Plans

1. Cross-Reference: "Community Relations Plan - Bay Drums, Peak Oil, and Reeves Southeastern Corporation Superfund Site," EPA Region IV (August 1989). [Filed in Appendix E of entry number 3 in 3.4 REMEDIAL INVESTIGATIONS - Work Plans and Progress Reports].

### 13.7 News Clippings and Press Releases

- 1783 - 1. "EPA Initiates Cleanup at Bay Drum Site," Environmental News, EPA Region IV (March 9, 1989).

## 13.7 News Clippings and Press Releases (cont'd.)

- 1785- 2. "EPA Public Meeting/Comment Period," EPA Region IV (August 1992). Concerning the opening of the Public Comment Period and announcing the public meeting to be held August 18, 1992, for the Peak Oil, Bay Drums, and Reeves Southeastern Galvanizing Corporation Superfund sites.

## 13.8 Public Meetings

- 1788- 1. "United States Environmental Protection Agency: Public Meeting; Tuesday, August 18, 1992." (August 18, 1992). Concerning public meeting for the Peak Oil, Bay Drums, and Reeves Southeastern Galvanizing Corporation Superfund sites.

## 13.9 Fact Sheets

1. Cross-Reference: "United States Environmental Protection Agency; Superfund Proposed Plan Fact Sheet; Bay Drums Site; Tampa, Hillsborough County, Florida," EPA Region IV (August 1992). [Filed and cited as entry number 1 in 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action]

## 16.0 NATURAL RESOURCE TRUSTEE

## 16.1 Correspondence

1. Cross-Reference: Letter from John Mitchell, Florida Department of Natural Resources, to Madolyn Dominy, EPA Region IV (September 4, 1992). Concerning need for copy of Feasibility Study Report in order to evaluate the Proposed Plan Fact Sheet. [Filed and cited as entry number 5 in 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action]
2. Cross-Reference: Letter from John Mitchell, Florida Department of Natural Resources, to Madolyn Dominy, EPA Region IV (September 16, 1992). Concerning comments to the draft Record of Decision (ROD). [Filed and cited as entry number 1 in 5.9 RECORD OF DECISION (ROD) - Record of Decision (ROD)]

## 16.0 NATURAL RESOURCE TRUSTEE

### 16.1 Correspondence (cont'd.)

3. Cross-Reference: Memorandum from Mark Fite, EPA Region IV, to Site Administrative Record File (March 30, 1993). Concerning discussion of concerns of the National Oceanic and Atmospheric Administration (NOAA) on the Record of Decision (ROD). [Filed and cited as entry number 6 in 5.9 RECORD OF DECISION (ROD) - Record of Decision (ROD)]
4. Cross-Reference: Memorandum from Mark Fite, EPA Region IV, to Site Administrative Record File (March 30, 1993). Concerning discussion of concerns of Florida Department of Natural Resources on the Record of Decision (ROD). [Filed and cited as entry number 7 in 5.9 RECORD OF DECISION (ROD) - Record of Decision (ROD)]

## 17.0 SITE MANAGEMENT RECORDS

### 17.8 State and Local Technical Records

- 1842- 1. Letter from J.C. Chastain, County of Hillsborough Office of the County Administrator, to Robert Caplan, EPA Region IV (November 6, 1986). Concerning the transmittal of the inspection report made by Inspector Haislop of the County of Hillsborough Fire Department and the report from the Environmental Protection Commission. [Note: The photographs provided with this report are available, upon request, from the Remedial Project Manager for this site].
- 1846- 2. Letter from Bob Thompson, State of Florida Department of Environmental Regulation, to Robert Caplan, EPA Region IV (November 20, 1986). Concerning the transmittal of photographs taken in May 1984 to show the fire that occurred at the facility. [Note: The actual photographs are available, upon request, from the Remedial Project Manager for this site].